Improving Extractive Industry Governance: Implementing the Voluntary Principles to Promote Human Rights in Nigeria and Ghana

Baseline Study

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I. Executive Summary

The Voluntary Principles on Security and Human Rights (VPs) is a multi-stakeholder initiative involving governments, companies, and NGOS, with the purpose of promoting guidelines for extractive industries to provide security for their operations in a manner that respects the rights of the communities in which they work. Global Rights’ project Improving Extractive Industry Governance: Implementing the Voluntary Principles to Promote Human Rights in Nigeria and Ghana was designed to: increase the level of knowledge and understanding of the VPs in Nigeria and Ghana; enhance dialogue and shared approach to security between host communities, companies, and governments using the VPs; and create a sustainable and broad-based local constituency to advocate that the governments of Nigeria and Ghana and extractive companies join and implement the VPs.

A baseline study was conducted to determine the level of knowledge, and degree of implementation of the VPs in Nigeria and Ghana. Survey data was requested from the three key stakeholder groups – communities and civil society organizations (CSOs), companies, and government bodies. Information from communities and CSOs was based on their perceptions of VPs penetration. In total, 334 community surveys were returned and analyzed; three corporate surveys and a letter were received, and Annual Reports from VPs participants operating in Nigeria and Ghana were reviewed, however we were unable to reach agreement on a modality for including company information in the analysis; no government responses were received.

An analysis of the information provided in responses to our survey by communities and civil society organizations led to the following insights:

1. Extractive host communities were largely unaware of the VPs. In Ghana, 82% of respondents stated they had “no knowledge” of the VPs. In Nigeria respondents were more closely split with 46% saying “yes” and 44% saying “no” when asked if they knew of the VPs.

2. Company grievance mechanisms were not well known among host communities; in Ghana slightly more than half of respondents (55%) were aware of companies’ established grievance mechanisms, whereas in Nigeria only 27% were aware. Yet even when communities knew of these grievance mechanisms, they reported these were not often used for Security Forces-related (i.e. VPs-related) grievances.

3. Community members used this survey to comment on numerous issues – such as land appropriation, environmental concerns, or unfair distribution of employment – that arise in the context of extractives, but that are beyond the specific parameters of the VPs as related to security forces.

4. Among those community members or CSOs who were knowledgeable of the VPs, respondents were largely unaware of the VP status of the companies operating in their local area.
5. Regardless of the VP status of the companies operating locally, the majority of community respondents – 85% in Ghana and 75% in Nigeria – did not believe that companies were implementing the VPs.
6. The lack of governmental engagement or oversight is detrimental to the process of promoting host communities’ human rights and companies’ security.

II. Background
Established in 2000, the Voluntary Principles on Security and Human Rights is a multi-stakeholder initiative involving governments, companies, and NGOs. This initiative was developed to promote implementation of a set of principles that guide oil, gas, and mining companies to provide security for their operations in a manner that respects human rights. Specifically, the VPs guide companies to conduct a comprehensive human rights risk assessment in their engagement with public and private security providers to ensure human rights are respected in the protection of company facilities and premises.¹

Global Rights has been a member of the VPs Initiative since 2012, and Nigeria and Ghana are countries where VPs participants focus implementation efforts.² Global Rights’ project Improving Extractive Industry Governance: Implementing the Voluntary Principles to Promote Human Rights in Nigeria and Ghana is a two and one-half year effort that began in July 2012. Funded by the United States Department of State Bureau of Democracy, Human Rights and Labor (DRL), and implemented by Global Rights’ Nigeria Country Office, the project’s objectives are to:

- Increase the level of knowledge/understanding of the VPs in Nigeria and Ghana.
- Enhance dialogue and shared approach to security between host communities, companies, and governments using the VPs.
- Create a sustainable and broad-based local constituency to advocate that the governments of Nigeria and Ghana and extractive companies join and implement the VPs.

To meet these objectives, one of the project’s early activities was an initial information gathering exercise. Survey data was requested from the three key stakeholder groups – communities and civil society organizations (CSOs), companies, and government bodies – to determine their level of knowledge and understanding of the VPs and the degree of VPs implementation across the two countries. The analysis of this survey data was proposed as the project’s baseline.

¹ From the U.S. Department of State website: http://www.state.gov/j/drl/vp/
² In March 2014 at the VPs Annual Plenary, the Government of Ghana announced its intention to join the VPs Initiative pending parliamentary approval and is a participating Government.
A. Purpose of Study
The successful in-country implementation of the VPs depends upon shared responsibility between companies, governments, host communities and civil society. A premise of the project was that the principle stakeholders have limited knowledge about the VPs (with the exception of the companies that are VPs Initiative participants). One of the project’s activities, therefore, was to assess the level of knowledge, and degree of implementation of the VPs in Nigeria and Ghana according to the perceptions of three key stakeholder groups: communities, companies, and government bodies. This report uses the information derived from an analysis of community and NGO survey responses and represents the baseline study for the project.

B. Methodology
This baseline study was intended to inform the project and its partners of the “level of awareness, adoption and implementation of the VPs.” Qualitative data was derived from survey instruments that were used variably as administrator-directed questionnaires or self-completed surveys, and were applied either to individuals or focus groups, identified through purposive sampling. Documents such as quarterly reports from Global Rights and their sub-grantees were reviewed to elaborate the survey development and implementation processes. (For further discussion on methodology related to information from companies, please see Section II.B.2.b. below).

1. Survey Instrument Development
Within the first quarter of the project, Global Rights completed three inter-related survey templates, one each for the government, community, and company sectors of Ghana and Nigeria. These templates were based on a review of literature available in the public domain related to implementation of the VPs, such as the Implementation Guidance Tools developed by several participants in the VPs Initiative. While varying in focus, the surveys sought information from the three stakeholder groups regarding issues such as: knowledge/extent of adherence to the VPs; the use and results of company human rights risk assessments; consultation with and between stakeholders; training and oversight of security forces; and human rights monitoring, grievance, and remedy mechanisms. Additionally, each survey sought to elicit information about the extent of gender-based violence linked to the use of security forces for extractive industry operations, as well as safeguards and mechanisms intended to prevent, mitigate, and remedy such incidences when and if they do occur.

Global Rights received pro bono assistance from Professor Kent Glenzer’s Advanced Evaluation class at the Monterey Institute of International Studies (MIIS) Masters in Public Administration program. This team of three graduate students – Adam Mathis, Britney Wehrfritz, and Matt Jira – assisted Global Rights to revise the

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3 As stated in introductory premise of the Community Survey instrument.
phrasing of some questions as well as the layout of the survey, to make the tools more user-friendly.

The community survey instrument was then shared with Global Rights' CSO partners in Nigeria and Ghana, and was further revised in an effort to ease administration. This revised survey was used by both the Nigerian and Ghanaian partners to collect perception data from communities, CSOs, and NGOs. Ultimately the community survey (see Annex A) was a nine-page instrument, with 89 questions: 39 of which were yes/no; 14 were multiple-choice; and 36 were open-ended questions accompanied by text boxes. The survey had two main sections. The first was Community/CSOs knowledge on basic principles of human rights and the VPs, which was further divided into two sub-sections: the first included eight questions that addressed knowledge of basic human rights and security issues, and the second had ten questions about knowledge of the VPs. The second section was Company and Government engagement, and included three sub-sections addressing risk assessments, security forces arrangements, and grievance mechanisms, with 42, 19, and 10 questions, respectively. The survey was used with individuals, community groups, CSOs and NGOs.

The company survey (see Annex B) was six pages, most of which were yes/no checkboxes, with some blanks for respondents to write in brief information – no more than five words – and the option to include attachments when applicable. Information was sought regarding the company’s knowledge of the VPs, its knowledge and implementation of risk and impact assessments, its collaboration and working arrangements with stakeholders, its policies on human rights and security, mechanisms for reporting on human rights and security, and its management of security forces.

The survey that was sent to government officials (see Annex C) was six pages with yes/no checkboxes accompanied by prompts for further elaboration, and some open-ended questions. Questions addressed a wide range of VPs-related topics, such as: government promotion and protection of human rights principles in security consistent with the VPs; government oversight of extractive industry risk assessments and security; the regulation, monitoring, and deployment of security forces; governmental arrangements with joint ventures, partners, and sub-contractors; on-site grievance mechanisms; and working relationships with stakeholders.

2. Survey Implementation
   a. Communities

Global Rights worked with local CSO partners, Women Initiative for Transparency and Social Justice (WITSOJ) in Nigeria, and Livelihood and Environment Ghana (LEG), who participated in aspects of the survey implementation as part of their sub-grant activities. Both organizations administered the surveys to communities. The implementation process varied somewhat across country and community, and is discussed for each country below. However, both partners aimed to consult with
a representative cross-section of each community, seeking to include the community chief or traditional leader, women leaders, youth leaders, Community Development Committee chairs, Assembly members, religious leaders, media representatives, or other opinion leaders. Survey administrators offered clarification or elaboration on questions as needed, provided translation, or read aloud and recorded responses for those who were unable to read the instrument themselves.

i. **Ghana**

LEG targeted three regions – Ashanti, Brong Ahafo, and Western (highlighted on the map below). Within these, LEG focused on four areas that are resource-rich and thus exemplify extractive operations and the use of security forces in Ghana: Ahafo, Obuasi, Jomoro, and Bibiani. LEG began administering community surveys in January 2013, with the identification of 16 communities within the targeted regions. The implementation team administered the surveys in various ways to ensure responses. In some instances, the survey was left with an individual to complete independently. More often, however, the survey was used as a questionnaire, with the questions read aloud and responses recorded by an administrator. This format was applied to both individuals – such as traditional authorities or opinion leaders – and focus groups, which included at least five members of homogenous groupings from civil society organizations, local media, youth associations, business associations, or faith-based organizations, where a single response was recorded on the survey form.
A total of 212 surveys were distributed, 109 were returned as follows. In Ashanti, 50 surveys were distributed across four communities, and 20 responses were received. In Brong Ahafo, 60 surveys were distributed, also across four communities, with 34 responses received. In the Western region 55 of the 102 surveys that were distributed were returned.
ii. Nigeria

Between mid-December 2012 and April 2013, WITSOJ administered surveys in 40 communities across two Nigerian states – Rivers and Bayelsa (highlighted in the map on the following page). Host communities for extractive businesses were selected, with the goal of having five surveys completed from each community. As in Ghana, some surveys were completed by respondents independently, but many were treated as questionnaires and recorded by the administrators. The survey instruments were also used as educational tools to familiarize communities with the VPs. A total of 225 surveys were received, 74 from Bayelsa State and 151 from Rivers State.

WITSOJ also requested survey responses from nine NGOs involved in VPs advocacy throughout the country (see list in ANNEX D). Information from the two NGOs that returned the survey is also included in the analysis.

Figure 6: Map of Nigeria
**b. Companies**

In Ghana, LEG was responsible for administering the company survey. By January of 2013, seven companies were selected (the list of companies is included as Annex E). Six of these companies are engaged with mining and the seventh with oil; three of these companies are VPs participants. AngloGold Ashanti operates in Ashanti; Newmont Ghana Gold Limited operates in Brong Ahafo; and Tullow Oil Ghana Limited, Bibiani Noble Mineral Resources and Chirano Gold Mines Resources operate in Western Region.

In Nigeria, the company surveys were distributed by Global Rights Nigeria. Eleven oil companies – both multi-national and Nigerian-owned – were selected, five of which are VPs participants. Each company was initially contacted via email, with the survey attached, and followed up with a telephone call to request a response. Meetings were requested to administer the surveys in person, but this request was declined.

In spring 2013, Global Rights engaged in additional efforts to obtain responses to the survey from companies in both Nigeria and Ghana. These efforts included letters to the corporate headquarters of all VPs corporate pillar participants (as well as selected non-VPs companies) operating in Nigeria and Ghana, telephone calls and in-person follow ups at their national offices, and in-person discussions on the margins of the annual VPs Plenary in March 2013. Global Rights received cooperation from the VPs Secretariat to facilitate a conversation at the end of May 2013 between Global Rights and VPs Initiative participants. In accordance with guarantees provided to those participating in the survey, a first draft of this report was provided to all organizations either named in the report or whose information was used – including information from Annual Reports to the VPs Initiative - for their review and comment in spring 2014. We benefitted from the engagement of the VPs Chair as well as DRL in summer 2014 in our efforts to reach an agreed modality for inclusion of company attributable information. As part of that effort, a second draft of the report in which all company attributable information was anonymized was provided to selected companies operating in Ghana and Nigeria. Unsuccessful in our efforts, the final report reflects information derived from community, civil society, and public sources only.

Of the eighteen companies contacted in Ghana and Nigeria, three VPs companies returned a completed survey, another replied with information via letter, and two acknowledged receipt. No responses were received from non-VPs companies. In an effort to gather additional information from companies, the project team collected 2012 Annual Reports, which are submitted annually on a confidential basis by each participant to the VPs Initiative.

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4 Some VPs participants opt to make their annual reports public.
c. Governments
As the identified third key stakeholder in this arrangement to ensure compliance with the VPs, pertinent government offices were contacted and requested to complete a survey. In Ghana, LEG contacted four government entities: the Ministry of Foreign Affairs, Regional Cooperation and NEPAD; Ministry of Lands and Natural Resources; Ministry of Energy; and the Ministry of the Interior. In Nigeria, surveys were distributed by Global Rights Nigeria to five government entities: the Ministry of Police Affairs; the Nigerian Police Force Intelligence Bureau; the Ministry of Petroleum Resources; Ministry of Mines and Steel Development; and the Joint Task Force. Unfortunately, no completed surveys were received from either the Nigerian or Ghanaian governments.

3. Survey Analysis
The completed surveys were collected in Global Rights’ Nigeria country office and then sent to the Global Rights home office in Washington DC for analysis in June of 2013. A US-based consultant was hired to review the surveys, later accompanied by a research assistant. The number of completed community surveys for Nigeria was 225; for Ghana it was 109. Data from the hand-written nine-page surveys were inputted into excel for frequency analysis of the numerical data. Text responses were then transferred to word documents for further text-based analysis. Data from corporate surveys was also analyzed.

III. Findings
A. Community Surveys
The community responses to these surveys represent the bulk of the baseline data available to the project. The information is treated separately for Ghana and Nigeria, and is presented in the order of the data collection instrument. For ease of reference, wording directly from the survey is shown in italics, whereas direct quotes from respondents are reflected in quotation marks. Percentages shown are portions of the total number of respondents per country, and therefore also reflect non-responses.

1. Ghana
Out of 212 surveys distributed, 109 responses were received and coded.

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5 The Joint Task Force combines units of the police, army, air force, navy, civil defense corps and other paramilitary bodies.

6 “Non-responses” refers to any question that did not have a corresponding answer, but also includes a number of pages that were either skipped or missing for the analysis, see Annex F.
**Knowledge of Basic Human Rights** and Security Issues

Survey respondents reflected an understanding of basic human rights. All 109 respondents answered the survey question *What are human rights?*, most by listing specific rights, such as the right to “education,” “own property,” “freedom of speech,” “life,” “form an association,” among others. Other responses reflected that all human beings are entitled to these rights, or that human rights are enshrined in law. One respondent from Brong Ahafo for example, wrote, “human rights are inalienable fundamental rights to which a person is inherently entitled simply because he or she is a human being.” When respondents were asked what entitled them to these rights, the answer was overwhelmingly “citizenship,” mentioned 73 times; the next most frequent answer was “the constitution” with 29 responses. Other answers included “being born” and “being human.” Most surveys showed that the responsibility for protecting human rights resided with government, yet many respondents saw protecting, fulfilling, or enforcing these rights as a shared responsibility among the government, companies, and citizenry.

While respondents clearly identified parties responsible for human rights, 85% indicated that *the actualization of rights in extractive host communities in the past decade* has either not been adhered to, or only partially so. When asked whether *communal rights may conflict with security arrangements around extractive companies*, 81% answered “yes.” Most – 80% – answered that the community had engaged the government or companies about the infringement of these rights, and 67% answered that they also knew of other communities who had done likewise.

**Knowledge of the Voluntary Principles**

Among those surveyed, 82% had no knowledge of the VPs. When asked whether they thought the VPs *hold the potential of establishing constructive channels of communications* between the three stakeholders, 43% answered positively, with the most common answer being that the VPs will create awareness and knowledge on human rights issues. Also mentioned was the creation of “mutual understanding,” “peace,” and “social coherence.” The majority – 88% of respondents – were unaware that any company operating in their community was a VPs Initiative participant, and 85% answered that they did not believe *that the local company has*

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7 The definition of human rights proposed by the project team for the purposes of the survey analysis is: *the rights and freedoms to which all persons are entitled.* Definitions used by implementing partners varied slightly, but were generally consistent; LEG-Ghana’s definition was “fundamental freedoms enshrined in the constitution,” whereas WITSOJ-Nigeria defined human rights as “the unalienable rights of the citizens of a community or country.”

8 For purposes of analysis, the definition used for the VPs is *guidance for extractive companies on how to maintain/provide safety for their operations while ensuring respect for human rights.* WITSOJ-Nigeria defined the VPs as “a multi-stakeholder initiative geared towards getting government to protect the rights of host communities from businesses operations in communities and companies/business to respect human rights while doing business in communities. Also it is a means where companies or business should remedy any human rights abuses done by its security operatives.” LEG-Ghana was more concise: “voluntary initiative that seeks to address security and human rights issues in the extractive sector.”
implemented or is implementing the VPs in their operations (see chart below). While most respondents did not elaborate on why they believed this to be true, one respondent wrote: “the cunning manner with which the police are mobilized to hot spots speaks of great abuse and non-compliance if the company has signed the document.” More than two-thirds (69%) rated the level of awareness on the VPs in the host communities and among CSOs as either a “low degree of knowledge” or “no knowledge” at all. Correspondingly, 79% answered that CSOs were either “not prepared” or only “fairly prepared” to take on issues bordering on human rights and security in the extractive communities.

Company and Government Engagement
Risk Assessments
Most respondents – 75% – answered that they were familiar with risk assessments. When asked whether companies had consulted with the community or local organizations about human rights impacts in security related issues, 72% answered “no”; but 58% were aware of company consultations with the community about problems related to security forces. Respondents in Ashanti cited meetings that took place in 2010, and another stated “there is engagement with different stakeholders on monthly/quarterly basis.” In Brong Ahafo, respondents mentioned meetings that had been conducted in 2004, 2010, and recently, in 2012; one such meeting was “organized by the health and safety department”, and two others mentioned that the meeting was “about security protecting the company.” In Western, community

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9 In the VPs context, risk assessment refers to the process for evaluating or assessing uncertainties – both in terms of likelihood/probability and impact/consequences – that can impede achieving a goal; in this instance, to identify ways to address uncertainties, and to ensure that security for extractive companies is managed in such a way that human rights are respected.
members from Bibiani Town said that there were meetings in 2012; one said “every three months they organize such meetings for the various leaders,” and another said that the meetings were held “about one in a half year now, through community forum.” Two community members from Jomoro also confirmed meetings that had been held “two weeks ago through community forum.”

Almost a third (29%) said that their organization or community had engaged with the government regarding these issues, and another 22% responded “yes,” that their organization or community had conducted an independent human rights risk assessment of the security arrangements of extractive companies. One CSO explained this relatively low rate of engagement by stating that “not much has been done” in terms of independent human rights risk assessments since “security concerns are addressed by the company and the country’s security agencies with no communal consultation.” Many community respondents stated they did not have the resources, capacity, or requisite skills to do any type of assessment. A community member in Brong Ahafo said, “the community members always feel that it is the responsibility of the company but not the community” and another in Dokyiwaa, Ashanti, stated, “we are afraid the company will call for our arrest.”

Examples that community respondents gave of independent human rights risk assessments in Western were related to water quality problems, where respondents said that water samples were lab tested, with a confirmation that the local river was polluted. Examples from Ashanti too related to water quality: “The chief brought an independent researcher to conduct a water quality test” with the results indicating “our water bodies are not good for drinking or domestic use.” Another community member stated that the “unavailability of water infuriated people to the extent that they blocked a road” and “one police officer at the scene attempted to use his AK-47 on a few of the people he considered troublesome.” In Obuasi (Ashanti region), a respondent described how, after disaster hit certain parts of the community, disaster management committees were formed with members of one of the VPs companies (AngloGold Ashanti) and local CSOs and NGOs. When asked whether communities, CSOs, companies, or government had been willing to engage on issues arising from these assessments, 17% answered “yes,” and 17% believed that the impact of their report had been “positive.”

Many (69%) answered that, within the past three years, companies have not consulted with the community on security issues or impacts. However, two CSO respondents noted that in Obuasi (Ashanti region) AngloGold Ashanti has consulted the community “once in a while” or “very often” specifically regarding “issues related to illegal mining and encroachment.”

The bulk of respondents (78%) were unaware of any campaigns on security issues for communities and CSOs initiated by any of the companies or the government. Yet 65% had taken note of problems or human rights concerns related to company security forces; and 37% either conveyed or tried to convey/discuss these with the company or government. More than half (53%) commented that they were aware of
Environmental or Social Impact Assessments conducted by the companies or the government. Another 50% said that they were aware of efforts by the company to gather information on environmental or social impact (see chart below). However, 65% answered that, at least within the past three years, the companies had not shared any of these results with the community.

![Chart showing awareness of Environmental or Social Impact Assessments]

When asked if any of the companies handle lethal or dangerous equipment or substances which could put host communities at risk, 64% answered “yes.” Moreover, 70% answered that they were not aware of protective measures the companies or government are taking to protect the health and rights of community members and staff. A further 74% said that the community had not been consulted by any of the companies on the handling of these equipment or lethal substances. Nearly two-thirds of respondents (61%) answered “yes” that they are aware of existing records of accidents affecting the community linked with the companies’ activities or and Company’s suppliers.

Security Forces (SF) Arrangements

Most surveyed (83%) answered that they were not aware of the details of either the companies’ or the government’s security arrangements. A further 58% answered that they were likewise unaware of consultations made with communities or CSOs on the parameters of these security arrangements, nor of consultations made by the companies and/or government on the impact of their security arrangements on host communities (77%). According to respondents, companies utilize both private and public security forces (see chart below). But very few, only 7%, were aware of
government’s regulation or standards on security issues for the companies. Only 5% answered affirmatively that they were aware of government’s sanctions against any company that violated them. Most respondents (65%) did not know if members of security forces were selected from among local communities’ members, nor did they know whether SFs carry weapons (82%).

More than half (58%) answered that communities have experienced challenges or had confrontations with the companies’ security forces in the past three years. In Ashanti, a community member from Binsere recalled a misunderstanding among community members and security forces that lead to gunfire, which killed one person; compensation was paid to the victim’s family. In Dokyiwaa, one challenge mentioned was the company’s effort to “do away with the small state miners around their area.” Respondents from Obuasi cited challenges ranging from security forces injuring community members, to confrontations between illegal miners and the locally operating company (AngloGold Ashanti), the killing of a community member, destruction of farms, and “water and chemical pollution.”

When asked how these issues were typically treated, regarding violent incidents, respondents stated that the local “media and CSOs added their voice to the issues or concern and nothing came out of it;” the illegal miners were brought to the police station; as far as the respondent knew, the victim’s family members had not been compensated for the death; and the environmental issues were being dealt with “through consensus approach,” and not yet resolved. In Western, community respondents living in and around Bibiani mentioned challenges such as “employment issues”, “self-employment”, and “employment demonstrations.” A respondent from Bibiani Town explained that the company operating in their area did not hire community members and would not allow small-scale miners to work on its property. Demonstrations against the company were cited, which lead to the imprisonment of some who “were severely brutalized and put into police cells for three days,” and the death of one community member. Issues regarding employment seem to be resolved in meetings between the mining company and the local traditional leaders, “Chiefs.” More serious issues were taken to court, yet respondents did not feel they were treated seriously, and one stated, “since the company has the purchasing power it was able to resolve it through court” [in the company’s favor]. In Jomoro District, recurring issues had to do with the destruction of coconut trees – mentioned by respondents in Old Kaben, New Kaben, Bonyere, and Half Assani – either with insufficient (one-fifth the proposed cost) or no compensation. One community member responded that the issue was “settled in the chief’s palace,” but most cited cases were still pending in court.

Most respondents (81%) answered “no,” to the question of whether there had been noted patterns of gender-based violence occasioned by the activities of the companies or their security forces. One CSO based in Obuasi, the Kaleo Area Women Development Association (KAWDA), indicated that gender-based violence had been evidenced through the destruction of farms and crops of peasant women.
Grievance Mechanisms
A little more than half of community members surveyed – 55% – were aware of established grievance mechanisms between host communities and the companies operating in the vicinity. Respondents described this mechanism as an office in the form of a “community information center” or “grievance office.” When asked to what degree these mechanisms are used by the community, most answered that it was not often used; one noted that communities “use it with reluctance since there aren’t any alternative avenues.” In response to the question of how responsive companies have been to the issues raised through these mechanisms, results were mixed. About 40% indicated that companies were “highly” or “very responsive” although sometimes in a “slow manner,” whereas another 40% indicated that companies were “non-responsive,” “less responsive,” or “mishandled” complaints brought to their attention. The most commonly cited complaints – mentioned 64 times – reported through these mechanisms were land issues, such as the destruction of farmland and/or crops, taking over of land without fair compensation, and resettlement. Pollution, either affecting land or water, was also commonly noted, and included “chemical spills,” “dust,” road and building damage, and a “water crisis.” Employment of community members, especially youth and individuals who have had land expropriated by the company, was also identified as a key issue.

Interestingly, 42% noted that security force related issues were not reported through these channels. Respondents were almost evenly split as to the accessibility of the established grievance mechanism process, as shown in the chart below. Yet in terms of transparency, almost half (49%), believed that the process was not transparent, compared with 22% who answered that “yes” it is. Moreover, 49% also answered that whatever resolution there was, was inadequate.
Those surveyed had suggestions to improve the established grievance mechanisms. The most frequent included speeding up the resolution process and increasing or diversifying the number of community members involved in the process by involving youth, chiefs, religious officials, government, the company, media, security forces, those with disabilities, or other community associations. A drawback to this strategy was noted in five of the surveys, where it was mentioned that community leaders sometimes represent their own interests and not that of the community at large.

2. Nigeria
The total number of surveys received and coded for Nigeria in this analysis is 225.

Knowledge of Basic Human Rights and Security Issues
The majority of respondents indicated an understanding of basic human rights. Answers reflected universal entitlement to these rights protected by law, and in some cases listed specific rights, such as “freedom of speech” or religious freedom. When asked what entitled them to these rights, the response was overwhelmingly “citizenship.” Over 90% of respondents identified the government as the institution responsible for “protecting, fulfilling or enforcing” human rights.

Yet the perception among 88% of respondents is that, within extractive host communities, the actualization of human rights has not been adhered to, or only partially so, over the past decade. In fact 60% believe that communal rights may conflict with the security arrangements around the extractive companies. Moreover, 60% have directly engaged the government and/or the companies regarding these infringements, and almost half (48%) know of other communities or CSOs that have also done so.
Knowledge of the Voluntary Principles

Respondents were almost equally divided among those who knew about the VPs (46%) and those who did not (44%). When asked whether the VPs hold the potential for establishing constructive channels of communication between the companies, communities, and the government on the protection of human rights in security arrangements around the extractives, 132 (59%) responded positively. The most common responses referenced the VPs as a tool to build relations between the three actors, to act as a “middleman” or “link,” to foster dialogue or the exchange of information, to create awareness, increase development, create a “framework” or standard for accountability of the extractives, and potentially, to prevent conflict. Five respondents answered negatively, citing the voluntary nature as unlikely to be effective; two respondents’ comments from Rivers State were telling: “the government does not enforce the laws on the companies,” and “[the VPs do] not engage the impacted community actively and [they are] voluntary.”

Almost three-quarters of respondents (72%) were not aware that companies operating in their community had signed on to the VPs, as compared with 22% who did. Not surprisingly therefore, 75% of respondents believe that whether or not the company is a VP participant, they are not implementing the VPs in their regular operations (see chart below). Some respondents associated the strong military presence with companies not implementing the VPs: “so much of military presence ... [and] constant intimidation by these security operatives who through financial inducement ... [have] turned themselves to the Lords of the Land,” and “in my experience working with communities, companies still use security personnel whom the communities know to have perpetrated human rights abuses around the communities, in terms of security arrangements, companies have not been known to consult with local communities.” Another respondent noted, “the extractive companies do not implement the VPs because of lack of awareness in the host communities.” Still others attributed the lack of VPs implementation to the lack of government oversight: “because the Nigerian state has not signed to it, so it cannot enforce it or compel the company to honor it”; and another, “because government does not hold them accountable.”

Most respondents, 76%, believe there is little or no knowledge of the VPs among host communities and CSOs. It stands to reason therefore that 60% of respondents perceived CSOs as only fairly prepared or not prepared to educate their respective communities on the VPs.
Company and Government Engagement

Risk Assessments

About half of the respondents (53%) said they knew what a risk assessment was. When asked if companies had ever consulted respondents about human rights impacts in security related issues, the vast majority (85%) answered “no.” Those few who knew of examples mentioned consultations that took place as early as 1993, 2006, and 2010; in 2011, two consultations were cited, one on “electrical risk awareness” and another “due to Agip’s failure to comply with the prevailing MOUs, which was even below standard.” Additional meetings were held “in 2012”; “during the establishment of the pipelines”; “when the security or safety of company equipment and staff were being threatened by hoodlums”; in 2013, regarding the building of the airport in Bayelsa State; and the Joint Investigation Visits (JIV) with Shell on impacted communities were also mentioned.

More than a third (36%) of respondents had engaged with the government on matters related to extractive industries within their communities, and approximately one-third of respondents (32%) answered that they were aware of a company consulting with a community about problems or human rights issues related to security forces. Interestingly, 20% claimed they – as an organization or community – had conducted an independent risk assessment of the security arrangements of extractive companies in their communities. Examples offered by respondents included: environmental impact assessments, such as reporting damage done to rivers and farmland; community campaigns; a facilitated meeting between an oil company and host community where the oil company arranged for public security personnel to be part of their team; an independent risk assessment that found peoples’ rights had been infringed. Perhaps most significantly, one respondent noted, “a community cannot conduct an independent human rights risk assessment when the community does not know what and how it is done.”
Results of these assessments were limited, as many respondents noted that there was “no help,” “assistance” or “support” of any kind, yet some examples of findings included environmental degradation, a “warning” sent to Agip regarding the behavior of their armed security forces, and the establishment of a vigilante group to help protect the community. Even so, 16% answered that as a result of their independent assessments, communities, CSOs, companies, or government was willing to engage with them on the issues raised.

When asked if respondents knew of companies or the government initiating awareness campaigns on security issues, 20% responded “yes.” Almost half (48%) answered that they or their organization had taken note of problems/human rights concerns related to company security forces, and that 40% had either conveyed or tried to convey/discuss these with the company or government. Approximately one-quarter of respondents (24%) were aware of Environmental or Social Impact Assessments conducted by companies or the government; another 15%, while not explicitly familiar with an impact assessment, were aware of companies’ efforts to gather information on environmental/social impact (see chart below). Of these, 15% answered that within the past three years, companies had consulted with the community or a local organization on how these assessments impact on security issues or relate to the community. Yet only 6% cited that these consultations were “held often.”

When asked whether respondents know if companies handle lethal or dangerous equipment or substances which could put host communities at risk, 44% answered
“yes.” When further probed, 73% were unaware of protective measures the companies or government are taking to protect the health and rights of the community members and staff, and 69% believed that companies had not ever consulted with communities regarding the handling of equipment or lethal substances.

Only 37% of respondents were aware of existing records of accidents affecting the community linked with the companies’ activities and/or companies’ suppliers. Even fewer, 22%, knew of any role of companies’ security forces in these issues.

Security Forces (SF) Arrangements
Half of all respondents were unaware of security arrangements for either companies or the government. Only six percent were aware of consultations with communities or CSOs on the parameters of security arrangements or their impact on communities. Respondents knew of companies utilizing both private and public security forces, with the distribution of responses shown in the chart below.

The majority – 67% – was unaware of government regulations or standards on security issues for companies, and only nine percent of respondents indicated they were aware of any sanctions imposed by the government against any company for such violations.

When asked if security force members were selected from among local communities’ members, 21% answered “yes.” Over half (53%) of the respondents knew of security forces carrying weapons, and had seen them both outside of the companies’ perimeters and in company cars. Respondents were equally divided on whether communities had experienced challenges or had confrontations with companies’ security forces within the past three years; 41% said “yes” and 42% said
“no.” Those who did comment – and many respondents did – on the types of challenges experienced described a range of incidents including: community protests; “blocking of communities from gaining access to company premises” or detaining community members when they were “attempting to enter into the company's premises to register their grievances,” which ranged from wanting more regularized employment to pollution, as in “our rivers are covered in oil”; intimidation, threats or harassment by security forces; “curfew imposition”; excessive use of force by security forces against communities; beatings; rape; shootings; killings.

When asked How were these issues typically treated?, most frequently respondents said “nothing was done,” it was “overlooked,” “ignored,” or “no result”; others cited bribery or financial settlements; and still others mentioned the issues were treated with “discipline,” “hostility,” or the “mobilization of armed personnel to communities.” Some answered via dialogue; this was referenced between companies and chiefs, kings, community leaders, youth representatives, or churches; one respondent said, “government interviews and mandates the extractive company to abide/adhere to the peoples demands,” and another talked about a situation that prompted “interventions by human rights groups.”

A quarter of respondents (25%) noted patterns of gender-based violence occasioned by the activities of the companies or their security forces in the last three years – although this figure may be underrepresented since other respondents also commented on abuses directed towards women, but did not answer “yes” to the specific question about patterns of gender-based violence. Incidents cited included intimidation and harassment, specifically at the flow stations and during community protests. More than 15 respondents indicated rape, forced prostitution, beatings, and molestation. Other issues included inequality of employment, and disparity in contract assurance between men and women. When asked to elaborate how these issues were typically treated, many indicated that few if any adequate steps had been taken. Some expressed a sense of “helplessness” or “feelings of being handicapped in challenging” gender-based violence; some respondents reported that victims had been intimidated or bribed. Of the few who responded that issues were being treated positively, “negotiations” and “dialogue” between the company and leaders of the community were mentioned.

Grievance Mechanisms

Less than a third (27%) of respondents were aware of established grievance mechanisms between host communities and companies. Of those who answered they were aware, when asked to briefly describe these mechanisms, respondents commonly described demonstrations or protests. In Rivers State, “peaceful demonstrations by either blocking the main road to halt vehicles and human traffic, or barricading a company's premises to bar workers from gaining entrance” and “violent demonstrations [where] at times the company's assets are either stolen or destroyed” were both described.
In Bayelsa State, several strategies were described, including: “seizure, blockade and shutdown” and another respondent noted “criticisms, confrontation, blockade, and shutdown.” Other answers included writing reports, contacting company bureaus and/or chiefs and elders of the community, and establishing a Global Memorandum of Understanding (GMOU) between the company and the host communities.

Twenty percent answered that security force related issues were reported through these channels, among other things such as: theft and assault; environmental issues such as pollution from oil spillage in the water, land, and air; company non-compliance with GMOUs; unemployment and unfair distribution of employment among the community, land acquisition problems, and lack of social amenities. However, 37% found these mechanisms to be not very accessible; 44% found the process to be not transparent, and 46% reported that the resolution was not adequate. Suggestions for improvement – noted at least five times – included: dialogue or consultations with the community; better responsiveness by companies to implement agreed upon GMOUs; more transparency and increased awareness; and lastly, the adoption of the VPs by the companies.

B. NGOs
Nine Nigeria-based NGOs were contacted and asked to complete the community survey. Two NGOs responded and their insights are included here. The first, CLEEN Foundation, is based in Abuja with a liaison office in the Niger Delta. Its organizational focus is security sector reform. While its core focus is not the extractives industry, CLEEN Foundation was contracted by an oil company to conduct VPs training for its staff. The second NGO, Lite Africa – a NGO pillar VPs participant - is in Delta State, and it runs a grassroots advocacy campaign on the VPs in Nigeria.

Neither NGO believed that the actualization of rights in extractive host communities has been adhered to in the past decade. Both thought that communal rights may in fact conflict with the security arrangements of extractive companies, and both knew of communities or CSOs that have engaged with companies or the government about the infringement of these rights.

Both NGOs were knowledgeable of the VPs, and believed that the VPs have the potential to establish constructive channels of communication between the three main stakeholders – communities, companies, and government. Both knew of companies within their communities that are VPs Initiative participants, but Lite Africa did not believe that the companies are implementing the VPs in their operations, stating “companies still use security personnel whom the communities know to have perpetrated human rights abuses around the communities [and] in terms of security arrangements, companies have not been known to consult with local communities.” CLEEN Foundation, however noted that based on trainings they had facilitated for security personnel “under SHELL PDC, interactions with their security managers evidence that they are fully aware of their responsibilities towards the host communities.”
From their perspective based in the capital, CLEEN Foundation believed that communities and CSOs have “no knowledge” of the VPs, and while the NGO answered that CSOs “should help in creating awareness within communities on the VPs and help in holding companies accountable to ensure compliance with the VPs,” the NGO did not believe the CSOs were prepared for the task. More optimistically, in Delta state, Lite Africa thought that communities and CSOs had a fair degree of knowledge of the VPs; that the role of CSOs should include “monitoring, reporting, advocating, awareness creation and capacity building, and facilitating dialogue between the companies, government and the communities,” and that CSOs were fairly prepared to take on this task.

While both NGOs were familiar with risk assessments as they relate to the VPs, they gave varying responses as to their interactions with companies and governments. CLEEN Foundation has been consulted by companies about human rights impacts in security related issues, but they have not engaged with government on human rights or security matters related to extractive industries. Lite Africa on the other hand had not been consulted, but had engaged with government regarding these issues. Neither NGO has conducted independent human rights risk assessments of the security arrangements of extractive companies.

<table>
<thead>
<tr>
<th>Question</th>
<th>CLEEN Foundation</th>
<th>Lite Africa</th>
</tr>
</thead>
<tbody>
<tr>
<td>Have the companies ever consulted you about human rights impacts in security related issues?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Have you engaged with the government on human rights and security matters related to the extractive industries within your community?</td>
<td>No</td>
<td>Yes</td>
</tr>
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CLEEN Foundation has not participated in any company led human rights risk assessment exercise, and they were not aware of any awareness campaigns on security issues for communities and CSOs initiated by either companies or the government. Their organization had taken note of problems or human rights concerns related to company security forces and had conveyed, or at least tried to convey, these to the company or government. Furthermore, they were unaware of any environmental or social impact assessments conducted by any of the companies or the government; they had not been consulted by any companies on how these assessments might impact security issues or relate to the community, at least not within the past three years. CLEEN Foundation did not know whether the companies handle lethal or dangerous equipment or substances; but they did know of measures taken to protect the health and rights of community members and staff. Moreover, they indicated that the community had been consulted by the companies on the handling of dangerous equipment or lethal substances. Finally, they were not aware of any existing records of accidents affecting the community linked with the companies’ activities or those of their suppliers.
Lite Africa indicated that they did know of companies handling lethal or dangerous equipment or substances and were unaware of any measures to protect the health and rights of community members and staff. They did not believe the community had ever been consulted by any of the companies on the handling of equipment or lethal substances.

Lite Africa responded that they were aware of company or government security arrangements. However neither NGO was aware of any consultations with communities or CSOs regarding these security arrangements or their impact. The companies that CLEEN Foundation was familiar with utilized both private and public security forces. Both NGOs were aware of governmental regulations and standards as they pertain to company security issues. Lite Africa further elaborated, stating “Nigeria is a signatory to the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.” Only CLEEN Foundation answered that they knew of government sanctions against companies who had violated these standards. Neither NGO knew if security force members were selected from among local communities’ members, but both stated they knew of them carrying weapons outside of the company’s perimeter.

CLEEN Foundation indicated they were unaware of specific challenges or confrontations that communities had experienced with companies’ security forces in the past three years. They were also unaware of any noted patterns of gender-based violence occasioned by the activities of the companies or their security forces during the same period.

Lite Africa indicated their awareness of established grievance mechanisms between host communities and companies and explained “the Chevron Global Memorandum of Understanding (GMoU) provides for a committee on conflict resolution.” Yet the NGO also noted that these mechanisms are little utilized by the communities; they “complain that such committees are neglected and have not been operational in the GMoU process.”

IV. Discussion

The data from the surveys administered to communities led to a number of insights.

A. Highlights

First, Global Rights’ project was predicated on the assumption that communities were largely unaware of the VPs. This proved to be the case, especially in Ghana, as 82% of respondents stated they had “no knowledge” of the VPs. In Nigeria respondents were more closely split with 46% saying “yes” and 44% saying “no” when asked if they knew of the VPs. Yet while administering the survey in Nigeria, WITSOJ noted “that most of the communities had little or no knowledge about the
VPs, ... their rights as host communities, or how to go about redressing abuses of their rights."

Second, in Ghana slightly more than half of respondents (55%) were aware of companies’ established grievance mechanisms, whereas in Nigeria only 27% were aware. Yet only 29% of respondents in Ghana and 20% in Nigeria answered that these grievance mechanisms were being used to report security forces-related issues.

Third, as corollary, the most commonly cited issues reported through companies’ established grievance mechanisms according to community respondents in both countries were related to land appropriation, environmental concerns, or unfair distribution of employment. Community members used this survey to comment on numerous issues that arise in the context of extractives, but that are beyond the specific parameters of the VPs as related to security forces.

Fourth, even among those community members or CSOs who were knowledgeable of the VPs in general, respondents were largely unaware of the VPs Initiative participant status of the companies operating in their local area. In Ghana, 88% answered that they were not aware of any company operating in the community that has signed on to the VPs; for Nigeria it was 72%. This is surprising since communities were selected based on their proximity to operational extractive industries. This highlights a gap between community knowledge/perception and that of the companies. For example, the major extractive company operating in Obuasi, Ghana, is AngloGold Ashanti, a VPs corporate pillar participant. Yet when asked, local Obuasi-based CSOs Envital Concern and the Muslim Youth Association noted that they were unaware of AngloGold Ashanti’s participation in the VPs Initiative. Envital Concern further commented, “AngloGold Ashanti has not come out clearly to state its position on the VPs.”

Fifth, regardless of the VPs Initiative participant status of the companies operating locally, the majority of community respondents – 85% in Ghana and 75% in Nigeria – did not believe that companies were implementing the VPs. Lite Africa wrote that “companies still use security personnel whom the communities know to have perpetrated human rights abuses around the communities [and] in terms of security arrangements, companies have not been known to consult with local communities.”

Sixth, community surveys reflected the perception that communities were not being consulted by companies. The chart below shows negative responses in both Ghana and Nigeria to three questions designed to illustrate community perception of companies’ engagement with the community.
Seventh, unable to reach agreement on a modality to include company attributed information, the baseline does not reflect the perceptions and engagement of companies with communities and national governments. Given the perceptions expressed by community and civil society respondents, bridging the perception, communication, and engagement gap related to VPs implementation remains a challenge to be addressed.

Eighth, also notable for their absence in this analysis were the governments. As the third pillar and key stakeholder of the VPs arrangement, their lack of engagement in the process or its oversight is most problematic. Based on community and CSO responses, most believed that it is the government who has the primary responsibility to protect basic human rights (91% in Nigeria, and 33% in Ghana10). Yet, the overwhelming majority (88% of respondents in Nigeria, and 85% in Ghana) answered that they perceived these rights being only partially adhered to, if at all, over the past decade. Complaints most frequently cited by communities when asked about their use of established corporate grievance mechanisms included land rights, environmental concerns, and employment – all valid concerns to be sure, but not directly related to the VPs, and most if not all significantly related to governance including oversight of business operations. So while there is a perception and communication gap between communities and companies, there is little or no

10 The percentage for Ghana in this case is under-reported due to the way the responses were recorded by survey administrators.
engagement, or accountability dialogue between the communities and the government.

B. Challenges and Limitations
There were a number of challenges during the data collection process for the baseline study, particularly with the implementation of the survey instruments.

For the community surveys, the local partners documented a number of challenges regarding implementation. In Nigeria, WITSOJ noted a reluctance of some community members to participate in the survey because they were concerned about their personal safety should they answer truthfully. Some also expressed a lack of faith in survey results having the potential to help curtail most of the problems they face with the extractive industries. Logistically too there were a number of difficulties. Some of the targeted communities “are volatile and were also ravaged by the recent flood disaster which made access to them difficult.” Additionally, the terrain was its own challenge. Rivers and Bayelsa State are located on the coast and given the remoteness of some communities they could only be accessed by speed boats, which demanded a significant investment of both time and funds. Given the length of the survey, it took a long time to administer, resulting in the need for interviewers to return as many as three times to meet with the respondents and finalize their answers. Unavailability of some of the focus groups targeted also occasioned additional trips.

In Ghana, survey administrators also noted that identifying relevant community representatives, accessing them, and then actually receiving their responses, proved challenging. LEG observed that in areas such as Jomoro and Bibiani Chirano, there were in fact very few CSOs to meet with, and of those that were found, even fewer were considered to be “strong,” meaning having office space, staff and a visible presence, with the exception of those operating in Obuasi and Ahafo. In some communities, traditional leaders, who tend to support the companies operating in their area, were unwilling to meet with LEG because they were concerned that a discussion of the VPs could be perceived as “against the companies.” LEG also commented that almost every respondent complained the questionnaire had too many questions. “The unwieldy nature of the questionnaire” required a significant investment of time, with the result that “almost all the groups met were unable to provide answers to their questionnaires within a day, except the illiterates,” in which case the survey was read and explained to them, and their answers recorded by the administrators.

Accessing companies too presented challenges. Considerable energies were expended in Global Rights’ country office and headquarters in a range of efforts to engage with and obtain responses to the survey from extractive companies as well as find an agreed modality for the inclusion of company attributable information in this baseline. No company information that was either provided or attributable to companies could be included in this report.
V. Conclusions
As evidenced by the information from the community surveys, for the VPs to be effective, all key stakeholders need to be engaged. The data from this baseline study established that communities were largely unaware of their rights and mechanisms for dialogue and seeking redress for grievances; they need greater information – including about the relative roles and responsibilities of companies and government – and support in order to be positively engaged. While unable to present information related to the perceptions and engagement of companies, demonstrable and sizeable trust and information gaps exist regardless of any efforts companies may be undertaking indicating that these efforts require further adjustment to reach communities. Finally, the governments have a significant governance role to play, and based on the lack of results in this information-gathering exercise, it is a role that has yet to be taken up resulting in a vacuum that has negative impacts on both communities and companies, and the overall security of their countries.
VI. Annexes

Annex A: Community Survey

COMMUNITIES SCORECARD ON VOLUNTARY PRINCIPLES

Premises:

- Results of this scorecard will establish a baseline on the level of awareness, adoption, and implementation of the Voluntary Principles (VPs). These results will inform how to target project activities, facilitate gauging progress/impact achieved during the project, and provide a basis for comparison/contrast between Nigeria and Ghana.
- Questions have been elaborated to reflect the key human rights concerns addressed by the VPs and how they play out within host communities and with CSOs in the Nigerian and Ghanaian extractive industry context.
- Administration of the scorecard will assist in identifying relevant stakeholders, highlighting local CSOs/communities perceptions on issues of security and respect for human rights; and identify options for effective civil society engagement with the VPs.

The questionnaire will be administered to identified community or thought leaders; local youth groups; women’s groups; local trade associations as well as civil society organizations (CSOs) including NGOs, faith-based organizations and development associations servicing extractive host communities especially on human rights issues.

Community/CSOs knowledge on basic principles of human rights and the Voluntary Principles

Knowledge of basic human rights and security issues

1a) What are human rights?

1b) What entitles you to these rights?

1c) Who should protect, fulfill or enforce them? State what part the institutions below play:
(a) Government (b) Company (c) People
1d) What is your perception of the actualization of rights in extractive host communities in the past decade?

(a) Adhere to  (b) Not adhere to  (c) Partially

1e) Can you think of communal rights that may conflict with the security arrangements around the extractive companies? (a)  (b) No

If yes:

1f) Has the community/CSO engaged the government and/or the companies about these rights that are being infringed? (a) Yes  (b) No

1g) Do you know of other communities/CSOs that have engaged government and/or the companies about these rights that are being infringed? (a) Yes  (b) No

Knowledge of the Voluntary Principles

a) Do you know what the Voluntary Principles are [EXPLAIN]? (a) Yes  (b) No

If yes: i. Provide a short response on what you think it is about

[Response]

ii. Do you think the Voluntary Principles hold the potential of establishing constructive channels of communications between the companies, communities and the government on the protection of human rights in security arrangements around the extractives? Why?

[Response]

(b) Do you know of any company operating in the community that has signed on to the Voluntary Principles? (a) Yes  (b) No

(c) Do you believe that this company has implemented or is implementing the Voluntary Principles in their operations? (a) Yes  (b) No

Kindly provide reasons for your response

[Response]
(d) How would you rate the level of awareness on the Voluntary Principles in the host communities and among CSOs? (a) no knowledge (b) low degree of knowledge  
(c) fair degree of knowledge (d) high degree of knowledge

(e) What do you think the role of CSOs should be in issues bordering on human rights and security in the extractive communities?

i. How prepared do you think the CSOs are for this task? (a) Fully prepared (b) Not prepared (c) Fairly prepared

(f) If not familiar with the VP by name, are you aware of any consultations, trainings or other exchange by the company with the community about security and human rights? (a) Yes (b) No

Company and Government Engagement

Risk Assessments:

a) Do you know what a Risk Assessment is? (a) Yes (b) No

EXPLAIN

If yes:

i. Give a brief explanation

ii. Have the companies ever consulted you, community or organization about human rights impacts in security related issues? (a) Yes (b) No

If yes:

1. Indicate when, how

iii. Have you or your organization/community engaged with the government on human rights and security matters related to the extractive industries within your community? (a) Yes (b) No
iv. If you don’t know what a risk assessment is, are you aware that company has consulted community about problems/human rights issues related to security forces? (a) Yes (b) No

b) Has your organization/community ever conducted an independent human rights risk assessment of the security arrangements of extractive companies in your community.
(a) Yes (b) No

EXPLAIN:

If yes:
   a. Kindly share your findings
      
   b. Was your report shared with any of the following: (a) Communities (b) The government (c) Companies (d) Other organizations

If you shared your findings:
   i. Which key personnel or department in the company/government did you specifically contact?

   c. Has any of the groups mentioned above (communities, CSOs, companies, government) been willing to engage with you on issues arising from your assessments? (a) Yes (b) No

      i. What impact do you think your report had on any of these groups?
         (a) Positive (b) No Impact

(b) Has your organization/community participated in any company-led human rights risk assessment exercise? (a) Yes (b) No

If yes, which companies?
   a. Please indicate if any of these groups participated in the exercise:
      (a) i. local organizations (provide details if available)
      (b) ii. community members (provide details if available)
b. Has any of the companies in the past 3 years consulted with the community/your organization on security issues/impacts related to the community? (a) Yes  (b) No
   i. Which companies held these consultations?

   ii. How often were/are these consultations held
       (b) Not at all
   iii. Who within the companies engaged with the community/CSOs on these issues?

   (c) Are you aware of awareness campaigns on security issues for communities and CSOs, initiated by any of the Companies or/and the Government?
       (a) Yes  (b) No
       If yes:
       i. Indicate communities and areas of intervention;

   (a) Covers large area   (b) Covers section of the Community

   iii. How and by whom the campaigns have been done:

   d. If you don’t know what a risk assessment is — have you or your organization taken note of problems/human rights concerns related to company security forces?
      (a) Yes  (b) No
      Have you either conveyed or tried to convey/discuss with the company?
      Government? (a) Yes  (b) No

   (c) Are you aware of any Environmental/Social Impact Assessments conducted by any of the companies or the government? (a) Yes  (b) No
      EXPLAIN:
Improving Extractive Industry Governance: Implementing the Voluntary Principles to Promote Human Rights in Nigeria and Ghana

If yes:

i. How did you access this information?

ii. Has any of the companies in the past 3 years consulted with the community/your organization on how these assessments impact on security issues or relate to the community? [a] Yes [b] No

iii. How often were/are these consultations held? [a] Very often [b] Not often

iv. Who within the Company did you engage with on these issues?

(c) If you don’t know what an environmental/social impact assessment is, are you aware of any efforts by the company to gather information on environmental/social impact? [a] Yes [b] No

EXPLAIN:

If yes, same questions as above.

(e) Do you know if any of the companies handle lethal or dangerous equipment or substances which could put host communities at risk? [a] Yes [b] No

If yes:

i. Are you aware of protective measures the companies and government are taking to protect the health and rights of community members and staff? [a] Yes [b] No

ii. Has the community ever been consulted by any of the companies on the handling of these equipment or lethal substances? [a] Yes [b] No

iii. Indicate known security measures to avoid misappropriation or diversion

iv. Indicate incidents that put the community’s wellbeing at risk and there resolutions within the past three years

(f) Are you aware of existing records of accidents affecting the community linked with the companies’ activities or/and Company’s suppliers? [a] Yes [b] No
Securities Forces (SF) Arrangements:

a) Are you aware of the companies’ or government’s security arrangements? (a) Yes (b) No

If yes:

i. Are you aware of consultations made with communities or CSOs on the parameters of these security arrangements? (a) Yes (b) No

If yes, kindly provide details of these consultations.

ii. Are you aware of regular consultations made by the companies and/or Government on the impact of their security arrangements on host communities? (a) Yes (b) No

If yes, kindly provide details of these consultations.

iii. Do you know if the companies utilize

(a) Private (b) Public security forces?

iv. Are you aware of any company’s SF recruitment criterion on:

(a) Hiring (b) Training (c) Appraisal process

(d) Process in place to encourage good practices (good performance, discourage bad behavior with regards to human rights)

(b) Are you aware of government’s regulations or standards on security issues for the companies? (a) Yes (b) No

If yes:

i. Briefly discuss these standards or laws

ii. Are you aware of government’s sanctions against any company that violated them? (a) Yes (b) No
b) Do you know if SF members were selected from among local communities’ members?
   (a) Yes (b) No

c) Do you know if SF carry weapons? (a) Yes (b) No
   If yes:
   I. Do you see SF carry weapons (a)
      outside the Company’s perimeter (b) into Company’s car

c) All of the above ☐

d) Have the communities experienced challenges or had confrontations with the companies’ SF in the past three years? (a) Yes (b) No
   If yes:
   i. What types of challenges were experienced?

   ii. How were these issues typically treated?

e) Have there been noted patterns of gender based violence occasioned by the activities of the companies or their security forces in the last three years? (a) Yes (b) No
   If yes:
   i. What types of gender based violence cases are most prevalent

   ii. How were these issues typically treated?

Grievance Mechanisms

a) Are you aware of established grievance mechanisms between host communities and any of the companies? (a) Yes (b) No
   If yes:
   i. Briefly describe the mechanisms you are aware of.

   ii. To what degree are these mechanisms utilized by the communities or their members?
iii. How responsive have the companies been to the issues raised through these mechanisms?

iv. What types of issues are most commonly reported through these mechanisms?

v. Are security forces related issues ever reported through these channels? (a) Yes (b) No

vi. How accessible is the grievance mechanisms? (a) Very accessible (b) Not accessible

vii. Is the process transparent? (a) Yes (b) No

viii. Is the resolution adequate? (a) Yes (b) No

ix. What would improve the grievance mechanism?
Annex B: Corporate Survey

GLOBAL RIGHTS CORPORATE SURVEY ON THE VOLUNTARY PRINCIPLES

A. Human Rights Risk and Impact Assessment

1. Are you familiar with the Voluntary Principles on Security and Human Rights?
   - Yes ☐ No ☐
   If not, move on to question #2
   - Yes ☐ No ☐
   If so, has your organization signed on to the VPs?

2. Are you aware of whether your organization has a risk-assessment policy or plan?
   - Yes ☐ No ☐
   If not, move on to question #3
   - Yes ☐ No ☐
   If so:
     • Please provide a copy of this plan, if possible.
     - Yes ☐ No ☐
     • Is this policy/plan made available to the public?
       - Yes ☐ No ☐
       If so, how?
     • If it is not made public, which departments are able to access it?
     • Does this policy/plan address security and human rights concerns in line with the VPs?
     - Yes ☐ No ☐
     • Are local personnel and contractors provided with this policy/plan?
     - Yes ☐ No ☐

3. Does your organization conduct risk or impact assessments for its operations?
   - Yes ☐ No ☐
   If not, move on to question #4
   - Yes ☐ No ☐
   If so:
     • What topics are covered in these assessments?
     - Yes ☐ No ☐
     • How often are these assessments conducted?
     - Yes ☐ No ☐
     • When was the most recent assessment conducted?
     - Yes ☐ No ☐
     • Who is responsible for the administration of these assessments?
     - Yes ☐ No ☐
     • Who is responsible for compilation and analysis of the results?
     - Yes ☐ No ☐
     • Who is responsible for the development and implementation of any recommendations generated by the results or responding to any concerns identified?
     - Yes ☐ No ☐
     • Are the findings of the risk assessment made available to the public? If so, by what means?
     - Yes ☐ No ☐
     • If it is not made public, which departments are able to access it?

4. Does your organization have a corporate-level policy that addresses the protection of human rights?
   - Yes ☐ No ☐
   If not, move on to question #5
   - Yes ☐ No ☐
   If so:
     • Does this policy include provisions related to security providers?
     - Yes ☐ No ☐
     • If so, does the policy specifically refer to the VPs?
     - Yes ☐ No ☐
- Do local personnel and contractors receive training on your organization’s human rights policy or the VPs?
  
- Is this policy connected with your organization’s contractual interactions with security providers?
  
- Does this policy include provisions related to engaging local communities (including civil society) hosting operations? If yes, what does the policy provide?
  
- Does this policy include provisions related to engaging national/local Governments in area of local operations? If yes, what does the policy provide?
  
- Is this policy clearly explained to local personnel and contractors? If yes, by whom?
  
- Which department(s) is responsible for implementing this policy?
  
- Is this policy made public? If so, by what means?
  
- Is there a process in place for tracking and reporting the performance of local personnel and contractors with regards to this policy?
  - Are these reports made public?
  
- Is there a clearly defined plan for implementing this policy into local operations?
  
- Does the policy have a clearly defined way to identify relevant stakeholders in area of operations for purposes of implementing the policy?

5. Does your organization have a clearly defined plan for monitoring and evaluating the implementation of its human rights policies?
   If not, move on to question #6
   If so: please briefly explain:

6. Does your organization have an on-site process for registering communities' concerns?
   If not, move on to question #7
   If so:
   - Is the process conducted in the local language?
   - Is the process easily accessible for local community members?
   - Is there a clearly defined plan for handling complaints from community members?

7. Has your organization or its employees (not including security forces) been accused of human rights violations?
   If not, move on to question #8
   If so, briefly explain how the organization has handled such accusations:

8. Does your organization have measures to ensure the safety of its female work force and their vulnerability to gender based violence?
   If not, continue to the next section of the survey.
   If so, please briefly explain these measures:
B. Working with Stakeholders

1. Does your organization have a stakeholder consultation policy? □ YES □ NO
   If so, please indicate which stakeholders:
   □ YES □ NO

2. Does your organization communicate or consult with local stakeholders during the course of normal business operations? □ YES □ NO
   If not, continue to the next section of the survey.
   □ YES □ NO
   • Please describe the context of such meetings.
   • Are consultations with stakeholders held on a regular or ad-hoc basis?
   • What are the stated goals of such consultations?
   • Who represents your organization during such consultations?
   • Do consultants not affiliated with your organization facilitate any such consultations?
   • Are stakeholders involved in monitoring the impacts and benefits of projects within their community?
   • Does your organization inform stakeholders of any actions taken based upon their concerns or recommendations?

C. Security Forces

1. Does your organization provide security for its operations through the use of public security forces, private security forces, or both? □ PUBLIC □ PRIVATE □ BOTH
   □ YES □ NO
   • Please briefly indicate which department(s) within your organization have responsibilities relating to use of these security forces.

2. Public Security Forces (PuSFs). If your organization makes use of PuSFs, please complete this section. If not, please move on to question #3.
   □ YES □ NO
   • Which department(s) have responsibilities related to the use of PuSFs?
   • Vetting. Does your organization conduct security background checks on its PuSFs?
   □ YES □ NO
   • Training. Does the federal government provide human rights training for public security forces that provide security for company operations?
   □ YES □ NO
   If not, move on to the next bullet.
   If so:
   • Has your organization conducted a vetting process for adequacy of the state training program?
   □ YES □ NO
   • Furthermore, if this vetting process finds that state training is inadequate or non-existent, does your organization provide supplemental training for PuSFs assigned to it? If so, please briefly describe:
   □ ATTACHED
   • Please provide a copy of these training materials.
• Does your organization clearly explain its human rights and security policies to public security personnel?

□ YES □ NO

• **Consultation.** Does your organization conduct regular meetings with PuSFs regarding human rights?

□ YES □ NO

• Does your organization conduct regular meetings with federal government officials regarding the performance of PuSFs?

□ YES □ NO

• Does your organization conduct regular meetings with local community members regarding the performance of PuSFs?

□ YES □ NO

• Does the host government have reporting requirements regarding utilization of PuSFs by a private organization?

□ YES □ NO

If so, please briefly describe:

• **Sanctions & Oversight.** Does your organization have any authority in choosing the PuSFs being assigned to them?

□ YES □ NO

• What degree of control does your organization have over the actions of PuSFs assigned to it?

□ YES □ NO

• Does your organization have a system in place for monitoring the conduct of the PuSFs assigned to it?

□ YES □ NO

If so, please briefly describe:

• Does your organization have the means to address poor performance by its PuSFs with the appropriate government authorities?

□ YES □ NO

If so, please briefly describe:

□ YES □ NO

• **Weapons.** Are your organization’s PuSFs authorized to carry weapons?

□ YES □ NO

If not, go on to the next bullet

If so:

• Does your organization provide weapons for their assigned PuSFs?

□ YES □ NO

• Are PuSFs authorized to carry weapons outside your organization’s perimeter?

□ YES □ NO

• Are PuSFs authorized to carry weapons inside company vehicles?

□ YES □ NO

• **Human Rights Abuses.** Does your organization have an established method for recording and reporting human rights abuses by PuSFs?

□ YES □ NO

If so, please briefly describe:

□ YES □ NO

• Have there been human rights violations by PuSFs reported within the last three years within communities in which your organization’s activities are taking place?

□ YES □ NO

If so, do any of these violations involve women or gender-based violence?

□ YES □ NO

If yes, please specify the violation(s):

3. **Private Security Providers (PrSPs).** If your organization makes use of PrSPs, please complete this section. If not, please continue to the next section of the survey.

42
• Does your organization employ its own security force, or does it contract with a private security company? If contracted, with which company?

• **Vetting.** Does your organization conduct security background checks on its PrSPs?

• If your organization contracts with a private company, are background checks conducted on the company beforehand?

• Does your organization vet the personnel background checks conducted by the private security company?

• **Training.** If your organization contracts with a private security company, do they provide human rights training for their PrSPs?
  
  • If so, has your organization conducted a vetting process for adequacy of their training program?
  
  • Furthermore, if this vetting process finds that training is absent or inadequate, does your organization provide supplemental training for PrSPs assigned to it? If so, please briefly describe:
  
  • Please provide a copy of the curriculum, if possible.

• Does your organization communicate its human rights and security policies to the appropriate leadership personnel within the PrSPs?

• Does your organization communicate its human rights and security policies to individual security personnel?

• **Consultation.** Does your organization conduct regular meetings with its PrSPs regarding human rights?

• Does your organization conduct regular meetings with federal government officials regarding the performance of PrSPs?

• Does your organization conduct regular meetings with local community members regarding the performance of PrSPs?

• Does the host government have reporting requirements regarding utilization of PrSPs?
  
  If so, please briefly describe:

• **Sanctions & Oversight.** Does your organization have any authority in choosing the security personnel being assigned to them by a private provider?

• What degree of control does your organization have over the actions of PrSPs assigned to it?

• Does your organization have a system in place for monitoring the conduct of the PrSPs assigned to it?
  
  If so, please briefly describe:

• Does your organization have the means to address poor performance by its PrSPs with the private provider?
  
  If so, please briefly describe:
  
  Has this process ever been put to use?

• **Weapons.** Are your organization's PrSPs authorized to carry weapons?
  
  If not, go on to the next bullet

  If so:
● Does your organization provide weapons for their assigned PrSPs? □ YES □ NO
  If so, does your organization keep records of the transfer of these weapons?

● Are PrSPs authorized to carry weapons outside your organization’s perimeter? □ YES □ NO

● Are PsSFs authorized to carry weapons inside your company vehicles? □ YES □ NO

● Human Rights Abuses. Does your organization have an established method for recording and reporting human rights abuses by PrSPs? □ YES □ NO
  If so, please briefly describe:

● Have there been human rights violations by PrSPs reported within the last three years within communities in which your organization’s activities are taking place? □ YES □ NO
  ● If so, do any of these violations involve women or gender-based violence? □ YES □ NO
  ● If yes, please specify the violation(s):

D. Joint Venture, Partners, & Contractors

1. Does your organization outsource projects or sub-contract any portion of its operations to external service organizations? □ YES □ NO
  If not, move on to question #2.
  If so:
  ● Indicate the name of the external service organizations as well as the services they provide:
  □ YES □ NO
  ● Do the contracts between your organization and its external service providers reiterate your organization’s human rights and security policies? □ YES □ NO
  If so, do the contracts reference the VP’s?

2. Has your organization, by corporate merger or otherwise, taken over the operations and human rights policies of another organization? □ YES □ NO
  If not you have completed the survey.
  If so:
  ● Was any due diligence with regards to human rights and security issues undertaken prior to the acquisition? □ YES □ NO
  ● Were there any human rights risks or violations on the part of the second organization identified prior to the acquisition? □ YES □ NO
  If so, was anything done to address or mitigate these issues?
  ● Was a new or updated human rights and security policy generated after the acquisition? □ YES □ NO

Thank you for completing this survey.
Please attach any additional comments or documents to the last page of the survey.
Your participation is sincerely appreciated.
Annex C: Government Survey

GLOBAL RIGHTS GOVERNMENT SURVEY ON THE VOLUNTARY PRINCIPLES

Name (Last, First, Middle):

Office and Position:

Date:

A. Government promotion/protection of human rights principles in security consistent with VPs

 Has the national government taken observable steps toward the implementation of the VPs? □ YES □ NO

 If yes, what are those steps?

 What do you think are some of the negative aspects or obstacles to implementation of the VPs from the national government’s point of view?

 Do you know of any rational, regional, and local officials and agencies that are engaged in dialogue related to the implementation of the VPs? □ YES □ NO

 If yes, who?

 Has the government made an effort to promote or protect human rights consistent with the VPs as evidenced through policies, regulations, or laws? □ YES □ NO

 If yes, give an example.

 Is there currently any mechanism by which the national authorities monitor or regulate issues related to human rights and security within the extractive industries? □ YES □ NO

 If yes, describe the mechanism and those involved in it.

B. Government oversight of extractive industry risk assessments

 Does the government require extractive companies to consult and obtain “social license” from the host communities? □ YES □ NO

 If yes, how is there an enforcement mechanism for sanctions against the company if procedures are not followed?

 Are there specific provisions related to security? □ YES □ NO

 How is this consultation and consent process documented?

 Does social license necessitate informed consent from the host community? □ YES □ NO

 If yes, are the following contained in the informed consent: □ YES □ NO

 Details on environmental impact assessments?

 Details on social impact assessments?

 Details on human rights impact assessments?

 Does the government require companies to conduct risk assessments, including for human rights, environment, and social impact? □ YES □ NO

 If yes, who is responsible for monitoring and enforcing them?
When and how often does the government require that the company conduct risk assessments?

Does the government require the companies to report the results of corporate risk assessments to the government? □ YES □ NO

If yes, to which agency?

If yes, can members of the public obtain risk assessment information from the government? □ YES □ NO

If yes, how?

Does the government regulate or oversee corporate transfers of the following:

(If yes, then list the agency responsible underneath the subject.)

- Weapons □ YES □ NO
- Riot/Crowd control equipment □ YES □ NO
- Explosives □ YES □ NO
- Dangerous substances □ YES □ NO

Does the government conduct its own independent industry-wide risk assessment? If yes, please fill chart below:

<table>
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<tr>
<th>General Risk Analysis</th>
<th>Does It Include (Y/N)</th>
<th>Frequency</th>
<th>Risk to host community/citizens (Y/N)</th>
<th>Systems in place for taking action</th>
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<td>International Humanitarian law</td>
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</table>

C. Government oversight of security of extractive industries

Does the government require companies to report incidents linked with its operations and/or their sub-contractors? □ YES □ NO

If yes, outline regulatory scheme and responsible body.
Does the government directly intervene in industry-wide security issues? □ YES □ NO

If yes, which government agencies decide on direct interventions?

Does the government consult with companies before, during, and after the interventions? □ YES □ NO

D. Security Forces (SF)

Which department of government regulates and monitors extractive industry related security issues?

Does the Government provide public security to companies? □ YES □ NO

If yes, describe the arrangements for the deployment of such forces.

If yes, does the Government investigate the human rights record of SF to the level of its individual members? □ YES □ NO

Does the government regulate the employment of private security forces by companies, including hiring, retention, promotion, discipline, and training? □ YES □ NO

Does the government require the companies to conduct background checks on their private SF service providers/staff? □ YES □ NO

Does the government cross check companies’ SF backgrounds with available human rights or public violations records? □ YES □ NO

Do the government’s security arrangements/protocols with companies involve the following:

- public participation? □ YES □ NO
- release of information to the public? □ YES □ NO

If yes, does the government confer local communities on the impact of their security arrangements?

If yes, what form do these consultations take and how often do they occur? □ YES □ NO

Does the government require companies to maintain SF employees’ records on human rights and security? □ YES □ NO

Has the government ever applied sanctions against a company for unlawful or abusive actions by SF? If yes, describe. □ YES □ NO

Does the government have procedures/mechanisms for informing host communities of its own and the companies’ security measures? If yes, describe. □ YES □ NO
Does the government conduct or support education campaigns on security and human rights for communities and civil society organizations? □ YES □ NO
In focus, describe including types of intervention, length, content, and who conducts them.

Do government regulations permit companies’ private SF to carry weapons? □ YES □ NO
If yes, does the government maintain a list of SFs authorized to carry weapons within and outside the companies’ operational parameters? □ YES □ NO

What control mechanisms does the government have against the proliferation of weapons?

Is there a weapons registration process companies have to comply with? □ YES □ NO

Have any incidents of violence been associated with the SF (either public or private) in the past three years? □ YES □ NO
If yes, are trends observable?

What actions have been taken in response to these findings?

Have any incidents of gender-based violence associated with the SF been recorded? □ YES □ NO
If yes, are trends observable?

What actions have been taken in response to these findings?

Does the government ensure human rights protections are included in contracts with private entities (for public security)? □ YES □ NO

E. Joint venture and/or partners or contractors:

Is the government a partner in a joint venture with any of the companies? □ YES □ NO
If yes, indicate Government ownership share in the company(ies).

Does the government joint venture outsource projects or sub-contract sections of its operations to external service companies? □ YES □ NO
If yes, indicate the type of services that are outsourced.

Do the sub-contracts establish requirements for upholding human rights? □ YES □ NO

Have any violent incidents in the host communities been reported as attributable to outsourced companies? □ YES □ NO
F. Onsite Grievance Mechanisms

Does the government support and participate in on-site grievance mechanisms registering communities’ concerns? □ YES □ NO

- Community access to grievance mechanisms
- Protocol(s) for dealing with community complaints
- Government’s role in the process

How does the government ensure that vulnerable populations such as women, children, and disabled persons are able to access these grievance mechanisms?

Does the government have an ombudsman office for such complaints? □ YES □ NO

Does the Government have assistance from external consultants to articulate communities’ human rights/ security needs? □ YES □ NO

If yes, list the name(s) and contact information of the consulting organizations:

Do the consultant(s) speak host communities’ languages? □ YES □ NO

How do the consultants facilitate communities’ claims?

How does the government determine the appropriate community leaders with whom to interface?

How often do these interface meetings/ interactions occur?

Does government ensure that gender is mainstreamed in these representations? □ YES □ NO

G. Working with stakeholders

Pertaining to mining and extractive industries and human rights, who are the key stakeholders in the government - federal and local?

Does the government participate in multi-stakeholder consultations? □ YES □ NO

- If yes, briefly describe them.
Does the government regularly communicate with local communities on extractive companies and security concerns? □ YES □ NO

Does the government regularly communicate with extractive companies on security concerns? □ YES □ NO

Thank you for completing this survey. Please attach any additional comments or documents to the last page of the survey. Your participation is sincerely appreciated.
## Annex D: Nigerian NGOs Contacted to Complete a Survey

<table>
<thead>
<tr>
<th>NGO</th>
<th>Location</th>
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</thead>
<tbody>
<tr>
<td>Institute for Human Rights and Humanitarian Law</td>
<td>Port Harcourt, Rivers state</td>
</tr>
<tr>
<td>Pact Nigeria</td>
<td>Abuja and Bayelsa</td>
</tr>
<tr>
<td>Niger Delta Professionals for Development (NIDPRODEV)</td>
<td>Warri, Delta States</td>
</tr>
<tr>
<td>Leadership Initiative For Transformation and Empowerment, LITE Africa (Formerly NIDPRODEV)</td>
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</tr>
<tr>
<td>CLEEN Foundation</td>
<td>Owerri, Imo state</td>
</tr>
<tr>
<td>Stakeholder Democracy Network (SDN)</td>
<td>Port Harcourt</td>
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<tr>
<td>Search for Common Ground</td>
<td>Port Harcourt, Rivers state</td>
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<td>Civil Rights Congress</td>
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<tr>
<td>Afri Network for Environment and Economic Justice (ANEEJ)</td>
<td>Benin City, Edo State</td>
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### Annex E: Companies and Government Departments Contacted

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<tr>
<td><strong>Company</strong></td>
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<tr>
<td>Newmont Ghana Gold, Ltd.*</td>
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<tr>
<td>AngloGold Ashanti*</td>
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<tr>
<td>Chirano Gold Mines Resources, Ltd. (subsidiary of Kinross Gold)</td>
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<td>Tullow Oil Ghana, Ltd.*</td>
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<tr>
<td>Goldfields Ghana, Ltd.</td>
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<td>Bibiani Noble Mineral Resources, Ltd.</td>
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<td>Golden Star Resources, Ltd.</td>
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<th><strong>Government Office</strong></th>
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<tr>
<td>Ministry of Foreign Affairs, Regional Cooperation</td>
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* Indicates VPs participant
Annex F: Missing or Skipped Pages from Community Surveys

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<th>Page 1</th>
<th>Page 2</th>
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